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August 19, 2020

Via ECF

The Honorable Lorna G. Schofield United States District Judge United States District Court, SDNY 500 Pearl Street New York, NY 10007

Re: Katarzyna Cichon v Whitehall Properties II LLC and Outback Steakhouse of Florida, LLC; Docket No. 1:19-cv-6081(LGS)(RWL)

Dear Judge Schofield:

We represent the plaintiff in the above-entitled action. We write to respectfully ask the Court for an extension of the deadline for the parties to file a status letter (pursuant to Your Honor's Order of July 31, 2020) from August 19, 2020 to September 16, 2020. The reason for this request is because plaintiff does not have all the findings from plaintiff's expert inspection of August 12, 2020, but plaintiff's expert advises that violations still exist and need to be remediated. This information is necessary in order for the parties to prepare the joint status letter. Plaintiff expects to provide her expert's findings to defendants by August 26, 2020. Defendants request that they be allowed until September 9, 2020 to review those findings and, if necessary, confer with their expert. The parties will submit a joint letter on or before September 16, 2020, with the information requested in Your Honor's July 31, 2020 Order (ECF No. 54).

Plaintiff will also respond to defendants' last offer of settlement along with the production of her expert's findings, and the parties are hopeful that productive settlement discussions will continue during this period. This is the first application to extend this deadline and defendants consent to the extension. Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/

Glen H. Parker, Esq.

Lorna G. Schofield

United States District Judge

This application is untimely but nevertheless GRANTED. The parties shall file their joint letter by **September 16, 2020**. Per the July 31, 2020, Order, the status letter should include the time period for Defendants to complete the remaining remediations, an update on the status of settlement discussions, and if appropriate, a proposal on resolving outstanding claims.

Dated: August 20, 2020 New York, New York